

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION**

ALEXANDRA DAVIS,
Plaintiff/Counter-Defendant

VS.

CIVIL ACTION NO. 5:23-cv-00032-RWS

**JERRAL W. JONES, DALLAS COWBOYS
FOOTBALL CLUB, LTD., JAMES
WILKINSON, TRAILRUNNER
INTERNATIONAL, LLC, and DONALD
JACK, JR.**
Defendants,

VS.

CYNTHIA DAVIS-SPENCER
Third-Party Defendant.

DEFENDANT CYNTHIA DAIVS-SPENCER'S TRIAL WITNESS LIST

Third Party Defendant Cynthia Davis f/k/a Cynthia Davis Spencer, pursuant to the Court's Docket Control Order enter in this case, files this Trial Witness List for Identification and categorization of trial witnesses. At this time, Davis identifies the following witnesses for trial:

	Witness, employer, topic of testimony	WILL CALL	MAY CALL	MAY, BUT PROBABLY WILL NOT CALL
1.	Donald Jack, Jr., Jack Nelson Jones, PLLC; The exedcutor of the settlement agreement executed with Cyntia Davis (the "Settlement Agreement"), including payments made by Jack to Davis.		X	
2.	Jerral W. Jones; Dallas Cowboys Football Club, Ltd.: The lack of damages incurred by Jones and knowledge that he began breaching the settlement agreement almost immediately after execution.	X		
3.	Alexandra Davis; Cross-Defendant; Knowledge of Jones breach of Settlement Agreement		X	
4.	Cnthia Davis f/k/a Cynthia Davis-Spencer; Grand Homes; Knowledge of Jones breach of Settlement Agreement and numerous disclosures by Jones re paternity	X		
5.	DeAynni Hatley. Knowledge of Jones	X		

	disclosure of paternity to third parties in violation of Settlement Agreement.			
6.	Eugenia Jones. Knowledge of Jones disclosure of paternity to third parties in violation of Settlement Agreement.		X	
7.	Shy Anderson. Knowledge of Jones disclosure of paternity to him and Jones' sons in violation of Settlement Agreement.	X		
8.	Stephen Jones. Knowledge of Jones disclosure of paternity to him in violation of Settlement Agreement.		X	
9.	Jerry Jones Jr. . Knowledge of Jones disclosure of paternity to him in violation of Settlement Agreement.		X	
10.	Kris Hayes, Balekian Hayes; Expert testimony regarding the reasonable, usual, customary, and necessary attorney's fees incurred by Davis-Spencer in this baseless matter, as well as the parentage lawsuit against Jones/	X		

Respectfully submitted,

BALEKIAN HAYES, PLLC

/s/ Kris Hayes .

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**ATTORNEYS FOR THIRD PARTY
DEFENDANT**

CYNTHIA DAVIS-SPENCER

CERTIFICATE OF SERVICE

On October 13, 2023, I electronically submitted the foregoing document with the clerk of the court of the U.S. District Court, Eastern District of Texas, using the CM/ECF filing system. I hereby certify that I have served all counsel of record electronically or by another manner authorized by the Federal Rules of Civil Procedure

/s/ Kris Hayes .

KRIS HAYES